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March 15, 2022

Via ECF

Honorable Freda L. Wolfson, Chief Judge (Chambers)
United States District Court – District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street, Room 2020
Trenton, NJ 08608

Re: *Rachlin v. Baumann et al.*, Case 3:21-cv-15343-FLW-TJB

Your Honor:

As you know, I represent Avi Alexander Rachlin, Plaintiff in the above-referenced action. In accordance with Your Honor's "Temporary Order to Seal" (ECF #32) dated February 22, 2022, I have conferred with counsel for Defendants regarding whether any information or documents ought to be redacted or remain under seal. I regret to inform Your Honor that the Parties are unable to agree on a proposed sealing plan. Accordingly, on behalf of Plaintiff, and in the absence of agreement with Defendants, I respectfully request that the following documents on the docket, all of which either contain Plaintiff's medical records or directly quote or reference information from those medical records, be placed under seal or remain under seal:

- #10 (Plaintiff's Exhibit - Faiman Letter – 2021-3-19)
- #19-3 (Defendants' Brief in Support of Motion to Dismiss)
- #19-6 (Defendants' Exhibit – Plaintiff's Medical Records)
- #21 (Defendants' Brief in Opposition to Plaintiff's Motion for a Preliminary Injunction)
- #21-2 (Defendants' Exhibit – contains Faiman Letter & Plaintiff's Medical Records)
- #23 (Plaintiff's Reply Brief in Further Support of Motion for a Preliminary Injunction)
- #27 (Plaintiff's Brief in Opposition to Defendants' Motion to Dismiss)
- #27-1 (Declaration of Plaintiff in Opposition to Defendants' Motion to Dismiss)
- #30 (Opinion)

Respectfully submitted,

Edward A. Paltzik



cc: Eric L. Harrison, Esq., Methfessel & Werbel (via email)
Brian J. Chabarek, Esq., Davison Eastman Muñoz Paone, P.A. (via email)